

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

XILONG ZHU,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

CASE NO. 20-cv-5818-RSL

STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO FILE A
RESPONSIVE PLEADING

STIPULATION

COME NOW, Plaintiff, Xilong Zhu, and Defendants United States Department of Homeland Security, *et al.*, by and through their counsel of record, pursuant to Local Rules 10(g) and 16, and hereby jointly stipulate and move for an extension of the deadline for Defendants to respond to the Complaint by 30 days. Currently, Defendants' responsive pleading to the Complaint is due on October 19, 2020.

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

1 The parties submit there is good cause for an extension of the deadline. U.S.
 2 Citizenship and Immigration Services ("USCIS") has scheduled an interview for Plaintiff
 3
 4 on November 4, 2020 regarding his current N-400 application. This matter may be
 5 resolved without further involvement of the Court if USCIS grants Plaintiff's pending N-
 6 400 application. If the application is denied, Plaintiff will likely file an Amended
 7 Complaint. Continuing the existing deadline for a responsive pleading will allow the
 8 parties to conserve resources because they will not have to expend resources completing
 9 work on the case that may become moot (or the issues may change) once USCIS is able
 10 to interview plaintiff and issue a decision.
 11
 12

13 Stipulated to and presented this 16th day of October, 2020.
 14

15 CASCADIA CROSS BORDER LAW GROUP

16 s/ Margaret D. Stock

17 MARGARET D. STOCK

18 4300 B St., Ste 207

19 Anchorage, AK 99503

20 907-242-5800

21 Email: Mstock@cascadialawalaska.com

22 Counsel for Plaintiff

15 BRIAN T. MORAN

16 United States Attorney

17 s/ Sarah K. Morehead

18 SARAH K. MOREHEAD, WSBA #29680

19 Assistant United States Attorney

20 United States Attorney's Office

21 700 Stewart Street, Suite 5220

22 Seattle, Washington 98101-1271

23 Phone: 206-553-7970

24 Fax: 206-553-4067

25 Email: sarah.morehead@usdoj.gov

26 Counsel for Defendants

ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The deadline for defendants to file a responsive pleading to the Complaint is extended to November 18, 2020.

DATED this 19th day of October, 2020.

A handwritten signature in black ink, appearing to read "Mr S Lasnik", written over a horizontal line.

Robert S. Lasnik
United States District Judge